



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

ONE SOUTH STATION

**Boston, MA 02110
(617) 305-3500**

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LIEUTENANT GOVERNOR

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Robert N. Werlin, Esq.
Keegan, Werlin & Pabian, LLP
21 Custom House Street
Boston, MA 02110

BY FAX AND U.S. MAIL

RE: Boston Edison Company, D.T.E. 03-100

December 9, 2003

Dear Mr. Werlin:

Enclosed please find the Department of Telecommunication and Energy's first set of information requests on the above-captioned matter. Responses should be filed on or before December 22, 2003. If you have any questions, please feel free to contact me at (617) 305-3620.

Sincerely,

William H. Stevens, Jr.
Hearing Officer

cc: Mary Cottrell
Staff as assigned
Distribution List
Joseph Rogers, Assistant Attorney General

Encl.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
BOSTON EDISON COMPANY, D.T.E. 03-100

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Boston Edison Company in this proceeding.

1. "NSTAR Electric" or "Company" means Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company d/b/a NSTAR Electric, its officers, directors, employees, consultants, and attorneys.
2. "Company Filing" or "Filing" means all the documents NSTAR Electric filed in this proceeding.
3. "Filing Letter" refers to the letter from counsel for NSTAR Electric, Robert N. Werlin, Esq., pursuant to 220 C.M.R. § 5.03, that explained the proposed tariff entitled, "NSTAR Green Power Adjustment," M.D.T.E. No. 110, filed on October 16, 2003.
4. "NSTAR Green" means the tariff, NSTAR Green Power Adjustment, M.D.T.E. No. 110, filed with the Department on October 16, 2003.
5. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
6. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
7. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
8. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how

the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.

9. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
10. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
11. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the one copy of the responses directly to: (1) William Stevens, Legal Division; (2) Barry Perlmutter, Electric Power Division; (2) Joseph Tiernan, Electric Power Division; and (3) the distribution list in this proceeding. In addition to filing, please submit responses by e-mail to dte.efiling@state.ma.us and to william.stevens@state.ma.us.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
BOSTON EDISON COMPANY, D.T.E. 03-100

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company the following information requests.

- DTE 1-1 The Filing Letter at 2 states that the Company “has solicited bids from wholesale suppliers to provide certificates from new renewable resources.” Further, Attachment B to the Filing Letter at 1.1(g) requires “not less than five percent of the Renewable Attributes supplied under this Agreement being generated by qualifying wind or solar New Renewable Generation Units.” Please describe any and all other requirements bidders must satisfy to supply certificates to the Company.
- DTE 1-2 Please refer to the Filing Letter at 2, stating that the Company has “solicited bids from wholesale suppliers to provide certificates from new renewable resources.” The Filing Letter further states the Company has received initial bids and “is in negotiations for final contract terms and pricing for the certificates.”
- A. How many initial bids did the Company receive?
 - B. Describe any criteria, other than price, the Company applied to evaluate the bids and to select a successful bidder(s).
 - C. Based on the number of initial bids received and the negotiations of final terms, how many bidders does the Company anticipate contracting with?
 - D. Based on the number of initial bids received and the negotiations of final terms, describe the anticipated composition of the resource portfolio for NSTAR Green.
 - E. Based on the number of initial bids received and the negotiations of final terms, what is the anticipated term of the contract the Company anticipates entering into with a successful bidder(s)?
- DTE 1-3 Please refer to the Filing Letter at 3, which states that the Company proposes a “two-year marketing window to reach saturation.”
- A. Detail specific marketing efforts the Company will undertake to inform and educate customers about the NSTAR Green option. Provide complete and detailed documentation to support your response.
 - B. Will the price for NSTAR Green remain constant during the proposed two year period? If not, explain all possible reasons for a potential price change.

- C. Discuss the Company's plans for NSTAR Green at the end of the two-year marketing window (e.g., termination or evaluation of the program).

- DTE 1-4 Please refer to the Filing Letter at 2, which states that the NSTAR Green offering will include "some wind and solar resources." Does the Company intend to send information disclosure labels to participating customers that present the environmental attributes of the NSTAR Green product option?
- DTE 1-5 Please refer to the Filing Letter at 2, which states that the "NSTAR Green option will allow residential and small C&I customers to purchase an incremental 25 percent of the customer's total kilowatthour usage from a new renewable power source." Explain why the Company opted to offer one product, not a range of products (e.g., varying incremental percentage offerings or specific attribute-based products) through NSTAR Green. In the response, refer to customer survey responses, evaluation of other utility offerings, and other relevant research material the Company used when developing NSTAR Green.
- DTE 1-6 Please refer to the Filing Letter at 2, which states that the Company proposes to be the sole retail provider of NSTAR Green. Explain why the Company did not establish a model for NSTAR Green whereby competitive suppliers and electricity brokers vie for the opportunity to provide green product options directly to customers through the Company. In the response, please refer to customer surveys, evaluation of other utility offerings, and other relevant research material the Company utilized when developing NSTAR Green. Provide complete and detailed documentation to support your response.
- DTE 1-7 Please refer to the Filing Letter at 1, which states that research efforts in determining the viability of a "green" product option included an evaluation of other utility offerings from around the country.
 - A. List and describe the green product options offered by utilities from around the country.
 - B. Provide the Company's evaluation of the utility green product offerings from around the country.